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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF
DEFENDANTS' MOTION IN LIMINE
NO. 26**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
7 to File Under Seal Portions of Defendants’ Motion in Limine No. 26 (the “Administrative Motion”).
8 The Administrative Motion seeks an order sealing highlighted portions of Defendants’ Motion in
9 Limine No. 26 (“Defendants’ Motion”) and of Exhibits 1 and 3 to the Vu Declaration, as well as the
10 entirety of Exhibits 2, 4-10 thereto.

11 3. Exhibits 1-4 (green highlighted portions in versions filed herewith), and Exhibits 5-6
12 (entire documents) contain, reference, and/or describe Waymo’s highly confidential and sensitive
13 business information. Such information includes details regarding Waymo’s security measures and
14 protocols, the scope of forensic investigations conducted (including the identity of non-public targets
15 of those investigations), and detailed computer forensics regarding access to Waymo’s trade secrets. I
16 understand that Waymo maintains this information as confidential. The public disclosure of this
17 information would cause significant competitive harm to Waymo, as its security measures and
18 computer forensics methods would become known to competitors who could use such information to
19 Waymo’s disadvantage.

20 4. Exhibits 1-4 and 6 also contain email addresses and/or phone numbers of Waymo
21 employees and former employees involved in this case, the disclosure of which would cause Waymo
22 and those employees substantial harm due to the high public profile of this litigation.

23 5. Exhibits 1-4 and 6 additionally contain highly sensitive information that Waymo seeks
24 to seal. Specifically, those portions contain the domains that host Waymo’s highly confidential SVN
25 repository and other computer systems. Public disclosure of such information will give bad actors
26 seeking to hack Waymo’s databases a target to attack. Further, there is no public purpose served by
27 disclosing the precise web or IP address at which the servers reside.

6. Exhibit 6 additionally contains, discusses, or refers to confidential details regarding prototype development and testing of Kitty Hawk and/or related entities, which Waymo understands are highly confidential to Kitty Hawk, and disclosure of such information would inflict serious and irreparable damage to Kitty Hawk's business. (*See* Dkt. 1115 ¶ 3.)

7. Waymo's request to seal is narrowly tailored to those portions of Exhibits 1-6 that merit sealing. The request is consistent with previous sealing requests granted by the Court. (*See, e.g.*, Dkt. 1444.)

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 18, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor
Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven

Charles K. Verhoeven